

1 ELDA M. SIDHU
General Counsel
2 Nevada Bar No. 7799
J. MARTY HOWARD
3 Assistant General Counsel
Nevada Bar No. 1052
4 UNIVERSITY OF NEVADA, LAS VEGAS
4505 S. Maryland Parkway, Box 451085
5 Las Vegas, Nevada 89154-1085
Telephone: (702) 895-5185
6 Facsimile: (702) 895-5299
*Attorneys for Defendants the State
7 of Nevada ex rel. Board of Regents of
the Nevada System of Higher Education,
8 on behalf of the University of Nevada,
Las Vegas and Vernon Hodge*
9

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**
12

13 SUJANIE V.S.V. GAMAGE aka SUJANIE
14 GAMAGE SAMARASEK,

15 Plaintiff,

16 vs.

17 THE STATE OF NEVADA ex rel. BOARD
OF REGENTS OF THE NEVADA
18 SYSTEM OF HIGHER EDUCATION, on
behalf of THE UNIVERSITY OF
NEVADA, LAS VEGAS; a Political
19 Subdivision of the State of Nevada;
VERNON HODGE, individually and in his
20 official capacity as an employee of the
University of Nevada, Las Vegas; and DOES
21 I-XX inclusive,

22 Defendants.
23

CASE NO.: 2:12-cv-00290-GMN-VCF

**MOTION FOR ENLARGMENT OF
TIME TO FILE RESPONSIVE
PLEADING TO PLAINTIFF'S
COMPLAINT
[SECOND REQUEST]**

24 Defendants, The State of Nevada ex rel., its Board of Regents of the Nevada System of
25 Higher Education, on behalf of the University of Nevada, Las Vegas ("UNLV") and Vernon
26 Hodge, individually and in his official capacity ("Hodge" and collectively "Defendants") by and
27 through counsel, Elda M. Sidhu, General Counsel, University of Nevada, Las Vegas, and J.
28

1 Marty Howard, Assistant General Counsel, University of Nevada, Las Vegas, hereby move this
 2 Court for an extension of time in which to file a responsive pleading to Plaintiff's Complaint, that
 3 will extend the present deadline date of April 9, 2012 to **April 23, 2012**. This motion is brought
 4 pursuant to Fed. R. Civ. P. 6(b), LR 6-1 and LR 6-2, the attached points and authorities, and the
 5 papers and pleadings on file with the Court.

6 DATED this 6th day of April, 2012.

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 ELDA M. SIDHU
 General Counsel
 Nevada State Bar No. 7799
 J. MARTY HOWARD
 Assistant General Counsel
 Nevada State Bar No. 1052
 UNIVERSITY OF NEVADA, LAS VEGAS
 4505 Maryland Parkway, Box 41085
 Las Vegas, Nevada 89154-1085
*Attorneys for Defendants the State
 of Nevada ex rel. Board of Regents of
 the Nevada System of Higher Education,
 on behalf of the University of Nevada,
 Las Vegas and Vernon Hodge*

17 **MEMORANDUM OF POINTS AND AUTHORITIES**

18 I began working for UNLV on or about January 9, 2012 and am becoming familiar with a
 19 new area of the law and client.

20 I had scheduled a meeting with Defendant Hodge and another representative on April 5,
 21 2012 to discuss the process in a student academic misconduct case, go through and have the
 22 client explain the documents to me; and review the complaint and formulate an answer.

23 I was informed on or about April 4, 2012 the meeting needed to be rescheduled due to the
 24 fact it is spring break.

25 I have rescheduled the meeting for April 9, 2012.

26 This Honorable Court graciously granted the parties previous Stipulation to Extend Time
 27 to Answer Complaint (First Request) on March 7, 2012. (CR#8). Therefore, an answer is
 28 currently due on April 9, 2012.

Defendants would respectfully request an additional 10 business days to file an answer to the complaint in this matter to and including, April 23, 2012.

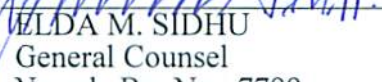
Federal Rule of Civil Procedure 6(b)(1) provides “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.” Fed. R. Civ. P. 6(b)(1)(A).

Judges have wide discretion in managing their dockets. See *Hernandez v. City of El Monte*, 138 F.3d 393, 399 (9th Cir. 1998). Also, Fed R. Civ. P. 6(b) (advisory committee note, 1946) (“Rule 6(b) is rule of general application giving wide discretion to the court to enlarge these time limits or revive them after they have expired...”).

CONCLUSION

Based on the above, University respectfully requests the Court grant an extension of 10 business days from the stipulated date University’s response to Plaintiff’s Complaint is currently due, April 9, 2012, until April 23, 2012, to file its Answer to Plaintiff’s Complaint.

DATED: April 6th, 2012.


 ELDA M. SIDHU
 General Counsel
 Nevada Bar No. 7799
 J. MARTY HOWARD
 Assistant General Counsel
 Nevada Bar No. 1052
 UNIVERSITY OF NEVADA, LAS VEGAS
 4505 South Maryland Parkway, Box 451085
 Las Vegas, Nevada 89154-1085
Attorneys for Defendants


IT IS SO ORDERED: April 6, 2012


 United States District Court Judge

CERTIFICATE OF SERVICE

I certify that on this date, April 6, 2012, I served the following *MOTION FOR ENLARGMENT OF TIME TO FILE RESPONSE PLEADING TO PLAINTIFF'S COMPLAINT [SECOND REQUEST]* via electronic service on the date and to the address(es) shown below:

Jason J. Bach, Esq.
Email: jbach@bachlawfirm.com
Michael L. Mascarello, Esq.
Email: mmascarello@bachlawfirm.com
THE BACH LAW FIRM, LLC
6053 South Fort Apache Road, Ste. 130
Las Vegas, Nevada 89148
Attorneys for Plaintiff


ANGELA CHRISTIAN, an employee
of the University of Nevada, Las Vegas